

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ROOT, INC., et al.,

Plaintiffs,

vs.

BRINSON CALEB SILVER, et al.,

Defendants.

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**Case No. 2:23-cv-512
Judge Sarah D. Morrison
Magistrate Judge Elizabeth A.
Preston Deavers**

**RECEIVER’S EIGHTH INTERIM REPORT, RECEIVERSHIP PLAN
AND APPLICATION FOR FEES AND EXPENSES OF RECEIVER AND
COUNSEL TO RECEIVER COVERING THE PERIOD
MARCH 16, 2024 THROUGH MAY 31, 2024**

In accordance with the requirements of this Court’s *Order*, filed May 12, 2023 (ECF 99), *Order Appointing Receiver*, filed May 17, 2023 (ECF 101), and *Order Amending Order Appointing Receiver*, filed June 7, 2023 (ECF 120) (hereinafter collectively “Receiver Order”), Jerry E. Peer, Jr. (“Receiver”), has taken possession and/or control of all monetary and real property assets of Mr. Brinson Caleb Silver, Collateral Damage, LLC and Eclipse Home Design, LLC (hereinafter collectively “Defendants”) known to Receiver, unless otherwise indicated herein. Pursuant to the Receiver Order and 28 U.S.C. §§ 754, 959 and 1692, Rule 66 of the Federal Rules of Civil Procedure, Receiver has completed this Eighth Interim Report and Receivership Plan and accompanying schedules (“Eighth Report”), which covers the period from March 16, 2024 through and including May 31, 2024 (the “Eighth Interim Period”).

I. INTRODUCTION

By way of the Receiver Order, Receiver was appointed to assume complete control and oversight of all monetary and real property assets of Defendants. Since the filing of the Seventh Report, Receiver has continued his efforts to liquidate the monetary and real property assets of Defendants, which have been identified by Receiver. At this time, Receiver is unaware of any

assets of Defendants that are not in Receiver's possession or under his control, with the exception of a bank account located in Jakarta, Indonesia. During the Eighth Interim Period, Receiver and his counsel have focused primarily on liquidating the known assets of the Defendants and negotiating with creditors holding secured claims in those assets.

A. 19803 Vista Del Otero, Ramona, California 92065 ("Ramona").

The sale of the Ramona property has closed. The net proceeds of the sale to the receivership estate was \$77,578.95.

B. 9125 North Bayshore Dr., Miami Shores, Florida 33138 ("Bayshore").

The sale of the Bayshore property has closed. The net proceeds of the sale to the receivership estate was \$319,891.85.

C. 2543 Walnut Ave., Venice, California 90291 ("Walnut").

As explained in Receiver's previous filings, during the Eighth Interim Period, this property, located in Venice, California, was offered for sale by and through an auction listing pursuant to the terms and conditions set forth in the *Motion of Receiver, Jerry E. Peer, Jr., to Employ Gryphon Asset Advisors, LLC as Auctioneer and to Offer Certain Real Property for Public Sale* (ECF 218). The Auction ended on March 16, 2024 with a high bid of \$2,650,800. However, the highest bidder, Kishnan Patel subsequently withdrew his high bid and refused to purchase Walnut. Thereafter, Receiver and his respective auctioneer and broker listed the Walnut property for sale and entered into a Real Estate Purchase Agreement, which has now been approved by this Court. As of the date of this Report, Receiver expects to close the sale of the Walnut property within the next seven (7) days.

D. Other Assets.

As mentioned above, at this time, the only known asset not currently in the possession or control of Receiver is the bank account located in Jakarta, Indonesia. Mr. Silver has represented

that the funds in these accounts have been exhausted, however, Receiver believes there may be significant funds deposited into these accounts and has requested that Defendants provide the information necessary to take control of the balance of that account, or to confirm that these accounts have indeed been exhausted.

II. RECEIVERSHIP PLAN

This Eighth Report will set forth (1) Receiver's intentions moving forward with regard to both identifying and taking control of assets as well as liquidating assets of value; (2) a statement of assets in Receiver's possession or under his control; (3) anticipated transactional costs to be incurred; (4) anticipated duration of the administration of this estate; (5) engagement of professionals to carry out Receiver's responsibilities; and (6) any litigation or administrative proceedings that are underway or anticipated.

1. Receiver's Goal/Expectations For Administration.

During the Eighth Interim Period, Receiver and his counsel have devoted efforts to liquidating the Walnut property. Once closed, Receiver will attempt to confirm whether the Jakarata account has any funds available for recovery.

2. Statement of Assets.

At this time, Receiver has not identified any new assets of the estate that have not been previously reported to this Court and the parties. As of May 31, 2024, Receiver currently has \$603,083.99 on deposit. A copy of Receiver's account register reflecting that amount, as well as the March 2024, April 2024 and May 2024 Huntington National Bank statements, are attached hereto as "**Exhibit A.**"

3. Anticipated Transactional Costs and Administrative Expenses.

It is difficult for Receiver to project the anticipated transactional and administrative costs of this estate. While certain expenses are customary and expected, such as administrative fees,

utilities, insurance, and other related operating expenses, costs are highly variable and may fluctuate greatly. Receiver expects to incur certain fees, commissions, and expenses associated with the liquidation of the assets and further administration of the estate. The anticipated costs will also depend greatly on success in taking control of the real estate and liquidating the assets in a cost-efficient manner.

4. Duration of this Receivership.

Based upon this plan, it is estimated that the duration of this receivership estate is three (3) months, depending on the sale of the Walnut property and what Receiver learns regarding the bank accounts mentioned above.

5. Engagement of Professionals.

Receiver previously engaged property managers in both Florida and California to assist with securing and maintaining the respective properties until sold. Due to the sale of the properties, Receiver has terminated those services while having Receiver's California realtor attend to any needs related to the Walnut property. In addition, previously engaged counsel in Florida to address the foreclosure action previously filed against the Bayshore property. With that property being sold, Receiver terminated the services of Dickinson Wright.

6. Litigation and Administrative Proceedings.

Receiver is not aware of any new litigation or administrative proceedings not previously reported to this Court.

III. CLAIMS

Receiver has identified various creditors/claimants of Defendants. Receiver has provided notice of the receivership to all known creditors/claimants of Defendants for which Receiver has valid addresses. As claims are received, a creditor matrix will be provided with subsequent interim reports, identifying the claimant and amount of each claim. Receiver notes for the Court no

independent analysis or review of the validity or allowance of such claims will be undertaken by Receiver until assets of the receivership estates are sold, at which time any claims will be reviewed and a recommendation as to the treatment of those claims will be submitted by Receiver.

IV. FEES AND EXPENSES

1. Receiver Fees and Expenses.

As required by the Receiver Order, Receiver is making application to the Court for interim allowance of compensation and reimbursement of out-of-pocket expenses. Please note that while Mr. Jerry E. Peer, Jr. was appointed as Receiver, due to the volume of work necessary, both Mr. Gregory S. Peterson and Mr. Istvan Gajary have performed certain services and billed that time at the Receiver rate of \$150 per hour rather than the counsel rate of \$250 per hour to assist with controlling the costs of administration. A detailed summary of activity for Receiver is attached hereto as “**Exhibit B**”. Receiver requests allowance and payment of interim compensation and expenses in the amount of \$2,340.00 to compensate Receiver for the hours expended and expenses incurred during the Eighth Interim Period.

2. Peterson Connors LLP Fees and Expenses.

Pursuant to the Receiver Order, Receiver employed the services of Mr. Peer, Mr. Peterson, and Mr. Gajary of Peterson Connors LLP (collectively “PetersonConnors”) as its legal counsel. Receiver requests interim allowance and payment of compensation to PetersonConnors in the amount of \$7,483.44 for services and expenses incurred during the Eighth Interim Period. Attached hereto as “**Exhibit C**” is the itemization setting forth the breakdown of time expended and costs advanced by PetersonConnors during the Eighth Interim Period.

3. Dickinson Wright PLLC Fees and Expenses

Pursuant to the Receiver Order, Receiver employed the services of Dickinson Wright PLLC (“DW”) as its legal counsel in relation to the litigation pending in Florida. Receiver

requests interim allowance and payment of compensation to DW in the amount of \$1,590.89 for services rendered to Receiver during the Eighth Interim Period DW Invoices are attached hereto as “**Exhibit D.**”

V. CONCLUSION

Receiver respectfully submits this Eighth Report and further respectfully requests that this Eighth Report and Receiver’s Eighth Interim Application for Allowance and Payment of Fees and Reimbursement of Expenses be approved.

Respectfully submitted,

PETERSON CONNERS LLP

/s/ Jerry E. Peer, Jr.
Gregory S. Peterson (0061915)
Jerry E. Peer, Jr. (0075128)
Istvan Gajary (0089084)
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Dublin, Ohio 43017
Telephone: (614) 365-7000
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jpeer@petersonconners.com
igajary@petersonconners.com
Counsel for Receiver, Jerry E. Peer, Jr.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was filed electronically on this June 18, 2024 with the Clerk of Court using the CM/ECF system. Service will be made through the Court's CM/ECF system on all parties and attorneys so registered, and all parties may access this filing through the Court's system.

A copy was also sent by regular U.S.P.S. mail to the following:

Brinson Silver
Butler County Jail
Inmate No. 303850
705 Hanover Street
Hamilton, Ohio 45011

Collateral Damage, LLC
C/O Brinson Silver
Butler County Jail
Inmate No. 303850
705 Hanover Street
Hamilton, Ohio 45011

Eclipse Home Design, LLC
C/O Brinson Silver
Butler County Jail
Inmate No. 303850
705 Hanover Street
Hamilton, Ohio 45011

Paige McDaniel
5576 Alexanders Lake Rd.
Stockbridge, Georgia 30281

/s/ Jerry E. Peer, Jr.
Jerry E. Peer, Jr. (0075128)

Huntington National Bank

Peterson
Conners LLP
ATTORNEYS AND
COUNSELORS AT LAW

Type	Date	Description of transaction	Cleared Y/N	Debit (-)	Credit (+)	Balance
wire	5/23/23	13105 Biscayne closing proceeds	Y		\$570,811.34	\$570,811.34
	5/31/23	Interest	Y		\$0.93	\$570,812.27
fee	6/15/23	Incoming Wire Fee	Y	\$18.00		\$570,794.27
fee	6/15/23	monthly fee, waived	Y	\$40.00	\$40.00	\$570,794.27
	6/30/23	Interest	Y		\$14.08	\$570,808.35
1001	7/11/23	Peterson Conners LLP	Y	\$77,574.02		\$493,234.33
1002	7/20/23	Kristin Hess, AC reimb.	Y	\$2,788.00		\$490,446.33
dep	7/24/23	Shellpoint funds	Y		\$16,513.89	\$506,960.22
1003	7/27/23	Calif. Auto. Ins. Co., 2543 Walnut Ave prem.	Y	\$1,260.15		\$505,700.07
	7/31/23	Interest	Y		\$13.28	\$505,713.35
1004	8/3/23	*void check*	-	\$0.00	\$0.00	\$505,713.35
1005	8/3/23	Daniel's Landscaping, 19803 Vista Del Otero	Y	\$2,250.00		\$503,463.35
1006	8/15/23	Peterson Conners LLP	Y	\$67,427.31		\$436,036.04
dep	8/29/23	Wave Runner sale proceeds	Y		\$10,000.00	\$446,036.04
	8/31/23	interest	Y		\$11.95	\$446,047.99
wire	9/20/23	Gryphon USA, Ltd. Ramona marketing advance	Y	\$12,126.00		\$433,921.99
	9/29/23	interest	Y		\$10.89	\$433,932.88
1007	10/3/23	Peterson Conners LLP	Y	\$28,731.22		\$405,201.66
1008	10/3/23	Hunt Ortman Palffy Nieves Inv. 102103	Y	\$901.87		\$404,299.79
1009	10/3/23	Dickinson Wright PLLC Inv. 1846072	Y	\$17,419.31		\$386,880.48
fees	10/16/23	wire and service fees <i>partially waived</i>	Y	\$90.00	\$40.00	\$386,830.48
1010	10/17/2023	Daniel's Landscaping, 19803 Vista Del Otero	Y	\$1,175.00		\$385,655.48
dep	10/27/23	ICON Aircraft, plane dock sale	Y		\$13,000.00	\$398,655.48
1011	10/31/23	Peterson Conners LLP	Y	\$14,915.61		\$383,739.87
	10/31/23	interest	Y		\$10.01	\$383,749.88
1012	11/2/23	Liquidation Partners, 19803 Vista Del Otero	Y	\$1,700.00		\$382,049.88
1013	11/14/23	Jimmy's Pool Service, Inv 16, 2543 Walnut	Y	\$500.00		\$381,549.88
1014	11/14/23	Daniel's Landscaping, 19803 Vista Del Otero	Y	\$1,200.00		\$380,349.88
1015	11/16/23	CBG, Inv. 2430 1 of 2	Y	\$322.48		\$380,027.40
1016	11/27/23	CBG, Inv. 2430 2 of 2	Y	\$361.48		\$379,665.92
	11/30/23	interest	Y		\$9.42	\$379,675.34

Type	Date	Description of transaction	Cleared Y/N	Debit (-)	Credit (+)	Balance
dep	12/12/23	sale proceeds, 19803 Vista Del Otero	Y		\$77,578.95	\$457,254.29
	12/29/23	interest	Y		\$10.95	\$457,265.24
wire	1/2/24	NewRez (Shellpoint) Walnut Ave. payment toward future payoff	Y	\$32,000.00		\$425,265.24
1017	1/2/24	PetersonConnors LLP	Y	\$50,858.14		\$374,407.10
1018	1/10/24	Tyler Hagerla, invoice 1	Y	\$1,295.29		\$373,111.81
fees	1/16/24	wire and service fees <i>partially waived</i>	Y	\$58.00	\$40.00	\$373,093.81
1019	1/25/24	Dickinson Wright PLLC 1852826, 1862856	Y	\$15,140.50		\$357,953.31
1020	1/30/24	Tyler Hagerla, Spectrum & Vivant reimbursements	Y	\$368.95		\$357,584.36
dep	1/31/24	Citizens Ins. policy premium refunds	Y		\$11,909.00	\$369,493.36
1021		void, printing error	N/A	\$0.00	\$0.00	\$369,493.36
1022	1/31/24	Jimmy's Pool Service, Invs. 27 & 34, Walnut	Y	\$375.00		\$369,118.36
	1/31/24	interest	Y		\$9.52	\$369,127.88
dep	2/1/24	Citizens Ins. policy premium refunds	Y		\$1,127.00	\$370,254.88
1023	2/8/24	Peterson Connors LLP	Y	\$27,383.46		\$342,871.42
1024	2/8/24	void, error	N/A	\$0.00	\$0.00	\$342,871.42
1025	2/13/24	CBG, Invoice 2569	Y	\$327.88		\$342,543.54
wire	2/14/24	Gryphon USA, Ltd. Walnut auction deposit	Y	\$12,126.00		\$330,417.54
wire	2/15/24	first half tax refund, Vista Del Otero	Y		\$10,111.88	\$340,529.42
fees	2/15/24	wire and service fees partially waived	Y	\$90.00	\$40.00	\$340,479.42
1026	2/28/24	Kelly Carlshe, Walnut cleanout	Y	\$750.00		\$339,729.42
	2/29/24	interest	Y		\$8.27	\$339,737.69
1027	3/6/24	Jimmy's Pool Service, Inv. 43, Walnut	Y	\$175.00		\$339,562.69
fees	3/15/24	wire and service fees partially waived	Y	\$108.00	\$40.00	\$339,494.69
wire	3/6/24	Bayshore Drive proceeds	Y		\$319,891.85	\$659,386.54
dep	3/28/24	Corinthian Title, proceeds Vista Del Otero	Y		\$1,243.94	\$660,630.48
	3/29/24	interest	Y		\$15.45	\$660,645.93
1028	4/4/24	Jimmy's Pool Service, Inv. 49, Walnut	Y	\$275.00		\$660,370.93
1029	4/4/24	Dickinson Wright invs. 1882161, 1889513	Y	\$15,039.50		\$645,331.43
1030, 1031	4/4/24	void, printing error	N/A	\$0.00	\$0.00	\$645,331.43
1032	4/4/24	Peterson Connors LLP	Y	\$37,691.75		\$607,639.68
wire	4/12/24	NewRez (Shellpoint) Walnut Ave. additional payment toward future payoff	Y	\$16,000.00		\$591,639.68
fees	4/15/24	wire and service fees partially waived	Y	\$58.00	\$40.00	\$591,621.68
wire	4/16/24	NewRez (Shellpoint) Walnut Ave. return of additional payment	Y		\$16,000.00	\$607,621.68
wire	4/18/24	NewRez (Shellpoint) Walnut Ave. additional payment toward future payoff	Y	\$16,896.98		\$590,724.70
dep	4/23/2024	Encinitas Ford, 2018 Mercedes Benz sale	Y		\$13,497.00	\$604,221.70
	4/30/2024	interest	Y		\$14.95	\$604,236.65

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THE HUNTINGTON NATIONAL BANK
PO BOX 1558 EA1W37
COLUMBUS OH 43216-1558



PETERSON CONNERS LLP
545 METRO PL S
DUBLIN OH 43017-5316

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1-800-480-2001

www.huntington.com/
businessresources

Huntington Unlimited Plus Checking

Account: -----4754

Statement Activity From: 03/01/24 to 03/31/24		Beginning Balance	\$340,487.69
		Credits (+)	321,151.24
		Regular Deposits	1,243.94
		Wire Transfer Credits	319,891.85
		Interest Earned	15.45
Days in Statement Period	31	Debits (-)	925.00
Average Ledger Balance*	608,176.65	Regular Checks Paid	925.00
Average Collected Balance*	608,016.13	Total Service Charges (-)	68.00
* The above balances correspond to the service charge cycle for this account.		Ending Balance	\$660,645.93

Average Percentage Yield Earned this period 0.029%
Interest paid last year \$81.51

Deposits (+)

Account:-----4754

Date	Amount	Serial #	Type	Date	Amount	Serial #	Type
03/28	1,243.94	179872148	Brch/ATM				

Other Credits (+)

Account:-----4754

Date	Amount	Description
03/06	319,891.85	INCOMING FEDWIRE TRANSFER
03/29	15.45	INTEREST PAYMENT


Checks (-)

Account:-----4754

Date	Amount	Check #	Date	Amount	Check #
03/06	750.00	1026	03/14	175.00	1027

(*) Indicates the prior sequentially numbered check(s) may have 1) been voided by you 2) not yet been presented 3) appeared on a previous statement or 4) been included in a list of checks.

Investments are offered through the Huntington Investment Company, Registered Investment Advisor, member FINRA/SIPC, a wholly-owned subsidiary of Huntington Bancshares Inc.

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**Service Charge Detail****Account:-----4754**

Date	Service Charge (-)	Waives and Discounts (+)	Description
03/15	50.00		WIRE TRANSFER FEES (OUTGOING)
03/15	18.00		WIRE TRANSFER FEES (INCOMING)
03/15	40.00		MONTHLY SERVICE FEE
03/15		40.00	TOTAL RELATIONSHIP SERVICE FEE WAIVE

Service Charge Summary**Account:-----4754**

Previous Month Service Charges (-)	\$108.00
Credits - Previous Month Charges (+)	40.00
Net Service Charges	\$68.00
Total Service Charges (-)	\$68.00

Balance Activity**Account:-----4754**

Date	Balance	Date	Balance	Date	Balance
02/29	340,487.69	03/14	659,454.54	03/28	660,630.48
03/06	659,629.54	03/15	659,386.54	03/29	660,645.93

In the Event of Errors or Questions Concerning Electronic Fund Transfers (electronic deposits, withdrawals, transfers, payments, or purchases), please call either 1-614-480-2001 or call toll free 1-800-480-2001, or write to The Huntington National Bank Research - EA4W61, P.O. Box 1558, Columbus, Ohio 43216 as soon as you can, if you think your statement or receipt is wrong or if you need more information about an electronic fund transfer on the statement or receipt. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

1. Tell us your name, your business's name (if appropriate) and the Huntington account number (if any).
2. Describe the error or the transaction you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
3. Tell us the dollar amount of the suspected error. We will investigate your complaint or question and will correct any error promptly.

Verification of Electronic Deposits If you authorized someone to make regular electronic fund transfers of money to your account at least once every sixty days, you can find out whether or not the deposit has been received by us, call either 1-614-480-2001 or call toll free 1-800-480-2001.

Balancing Your Statement - For your convenience, a balancing page is available on our web site <https://www.huntington.com/pdf/balancing.pdf> and also available on Huntington Business Online.



IMPORTANT INFORMATION ABOUT YOUR HUNTINGTON ACCOUNT(S)

- i. New language has been added to the Business Account Charges Form to further explain the Personal Checking Account Relationship benefit on your Unlimited Plus Business Checking account. Section 6 of your Business Account Charges Form is now replaced with the following:

Personal Checking Account Relationship Benefit

The business can avoid the monthly checking maintenance fee for any statement period on this checking account when a business owner maintains a personal Huntington Platinum Perks Checking Account, Private Client Checking Account, or a SmartInvest Checking Account through that same statement period. Business ownership for the purposes of this benefit is defined as a 25% or greater beneficial ownership interest and is determined by information in Huntington's client records. To update business ownership information please contact (800) 480-2001 or visit your nearest branch. To remove the benefit of a personal relationship, the owner of the personal checking account will need to contact (800) 480-2001.

Please retain this information for your records.

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PO BOX 1558 EA1W37
COLUMBUS OH 43216-1558



PETERSON CONNERS LLP
545 METRO PL S
DUBLIN OH 43017-5316

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Huntington Unlimited Plus Checking

Account: -----4754

Statement Activity From: 04/01/24 to 04/30/24		Beginning Balance	\$660,645.93
		Credits (+)	29,511.95
		Regular Deposits	13,497.00
		Wire Transfer Credits	16,000.00
		Interest Earned	14.95
Days in Statement Period	30	Debits (-)	85,903.23
Average Ledger Balance*	609,125.64	Regular Checks Paid	53,006.25
Average Collected Balance*	608,225.84	Wire Transfer Debits	32,896.98
* The above balances correspond to the service charge cycle for this account.		Total Service Charges (-)	18.00
		Ending Balance	\$604,236.65

Average Percentage Yield Earned this period 0.029%
Interest paid last year \$81.51

Deposits (+)

Account:-----4754

Date	Amount	Serial #	Type	Date	Amount	Serial #	Type
04/23	13,497.00	181614681	Brch/ATM				

Other Credits (+)

Account:-----4754

Date	Amount	Description
04/16	16,000.00	INCOMING FEDWIRE TRANSFER
04/30	14.95	INTEREST PAYMENT


Checks (-)

Account:-----4754

Date	Amount	Check #	Date	Amount	Check #
04/09	275.00	1028	04/04	37,691.75	1032*
04/08	15,039.50	1029			

(*) Indicates the prior sequentially numbered check(s) may have 1) been voided by you 2) not yet been presented 3) appeared on a previous statement or 4) been included in a list of checks.

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**Other Debits (-)****Account:-----4754**

Date	Amount	Description
04/12	16,000.00	OUTGOING FEDWIRE TRANSFER - MANUAL
04/18	16,896.98	OUTGOING FEDWIRE TRANSFER - MANUAL

Service Charge Detail**Account:-----4754**

Date	Service Charge (-)	Waives and Discounts (+)	Description
04/15	18.00		WIRE TRANSFER FEES (INCOMING)
04/15	40.00		MONTHLY SERVICE FEE
04/15		40.00	TOTAL RELATIONSHIP SERVICE FEE WAIVE

Service Charge Summary**Account:-----4754**

Previous Month Service Charges (-)	\$58.00
Credits - Previous Month Charges (+)	40.00
Net Service Charges	\$18.00
Total Service Charges (-)	\$18.00

Balance Activity**Account:-----4754**

Date	Balance	Date	Balance	Date	Balance
03/31	660,645.93	04/12	591,639.68	04/23	604,221.70
04/04	622,954.18	04/15	591,621.68	04/30	604,236.65
04/08	607,914.68	04/16	607,621.68		
04/09	607,639.68	04/18	590,724.70		

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1. Tell us your name, your business's name (if appropriate) and the Huntington account number (if any).
2. Describe the error or the transaction you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
3. Tell us the dollar amount of the suspected error. We will investigate your complaint or question and will correct any error promptly.

Verification of Electronic Deposits If you authorized someone to make regular electronic fund transfers of money to your account at least once every sixty days, you can find out whether or not the deposit has been received by us, call either 1-614-480-2001 or call toll free 1-800-480-2001.

Balancing Your Statement - For your convenience, a balancing page is available on our web site <https://www.huntington.com/pdf/balancing.pdf> and also available on Huntington Business Online.



IMPORTANT INFORMATION ABOUT YOUR TREASURY MANAGEMENT SERVICES AGREEMENT

If you have Treasury Management Services through Business Online, (e.g., Account Reconciliation, Automated clearing House ("ACH"), Automated Sweep, Business Security Suite, Cash Deposit and Fulfillment, Controlled Disbursement, eBill Present & Pay, Electronic Deposit, Escrow Solutions, Information Reporting, Integrated Payables, Lockbox Services, Wire Transfer, Zero Balance Accounting, etc.) please know that unless otherwise agreed upon, changes have been made to the Treasury Management Services Agreement. A complete copy of your updated and restated agreement effective July 1, 2024 can be viewed at www.huntington.com/TMServiceAgreement.

Changes to the Treasury Management Services Agreement (the "Agreement") are as follows:

1. Page 1: The first sentence of the paragraph beginning "Business Security Suite", is restated (additional/modified language italicized) as, "We have available certain products designed to discover or prevent unauthorized transactions, including unauthorized checks and ACH debits, forgeries, and alterations (*Business Security Suite includes check positive pay, reverse positive pay, teller block, check block, ACH positive pay and wire block*)."
2. Page 1: The next paragraph is restated (additional/modified language italicized) as, "*It is industry practice that business customers are responsible to discover and/or prevent unauthorized transactions. You agree that if your account is eligible for such products and you choose not to avail yourself of them, then we will have no liability for any transaction that occurs on your account that those products were designed to discover and/or prevent, nor will we have any duty to re-credit your account for any such losses. Please know that utilizing Business Security Suite does not prevent all losses. Huntington is responsible to act in good faith and with ordinary care, which does not include reviewing each transaction individually or insuring that you have no losses.*"

3. PART I. GENERAL TERMS AND CONDITIONS.

Section 6 is restated (additional/modified language italicized) as, "**Section 6. User Administration and Alerts.** You acknowledge and agree that you are responsible for managing Authorized Users including but not limited to adding, deleting or updating *Administrators* and Authorized Users (each a "User"), User profiles, unlocking passwords, determining appropriate service permissions, settings, and which accounts should be accessible to specific services and/or functions for each User.

You may elect to receive notifications from us ("**Alerts**") for applicable services via email or other Communication Method offered by us. Since Alerts will be sent over the internet, you may not receive Alerts *as expected*. You are responsible for ensuring Users are entitled for appropriate Alerts; removing Alerts from Users as appropriate; and ensuring appropriate Alerts are established for Users as part of administrative or User changes. *Please know you should not rely solely on Alerts. You should review activity via the Web Portal and take action before the applicable cut-off times as appropriate.*"

4. PART V: BUSINESS SECURITY SUITES

The fifth paragraph of Section 1 is restated (additional/modified language italicized) as "You may elect to receive notifications from us ("Alerts") regarding pending Exception Checks via email or other Communication Method offered by us. *Since Alerts will be sent over the internet, you may not receive Alerts as expected.* In consideration of the two foregoing sentences, you should review transactions via the Web Portal and appropriately change any instructions in a timely manner if you so desire, otherwise current instructions where you have provided us all of the required information in a timely manner shall apply.

The first two sentences of Section 3. ACH Positive Pay is restated (additional/modified language italicized) as "ACH Positive Pay services allow you to provide us instructions to (i) block all Entries *from other banks* from posting to your designated Account(s) with us, or (ii) permit individual Entries *from other banks* to post to your designated Account(s) with us. If you sign up for ACH Positive Pay, we will block all Entries *from other banks* (whether credit or debit) that attempt to post to your Account(s)."

5. PART X: ESCROW SOLUTION SERVICES

Section 3.D. is restated (additional/modified language italicized) as, "*The governing law of your account must be in a State where we have one or more branches, unless we agree otherwise.*"



6. PART XIV: is re-titled as "HUNTINGTON INSTANT PAYMENTS® (HIP)"

Relevant uses of RTP® have been restated as "HIP".

RTP® is a registered service mark of The Clearing House Payments Company L.L.C.

IMPORTANT INFORMATION REGARDING YOUR DEPOSIT ACCOUNT(S) AND/OR TREASURY MANAGEMENT SERVICES

EFFECTIVE JUNE 1, 2024

We are making the following changes to your business checking, savings, and/or money market account(s) as described in this notice. Unless otherwise specified, these changes are made as part of your *Business Account Charges Form*, which is part of your *Account Documents* (the "Agreement"). Please retain this document for your records.

Use of your account on or after June 1, 2024, indicates your acceptance of the changes. For more information about the changes, please contact your Banker, Relationship Manager, or call us at 1-800-480-2001, Monday through Friday, 8:00am to 8:00pm ET and Saturday, 8:00am to 2:00pm ET.

Beginning on June 1, 2024, the updated terms and/or fees for the impacted account services will be as follows:

- In Section 1, titled "Everyday Transactions", Deposit Correction is removed entirely.
- In Section 3, titled "Online Services, Statements and Other Service Fees", Bill Pay is removed entirely.
- In section 3, titled "Online Services, Statements and Other Service Fees", the Business Online-BOL fee is changed to \$20.00.
- In Section 3, titled "Online Services, Statements and Other Service Fees", Document Copies (Photocopy Fee) is removed entirely.

We want to inform you of upcoming price changes for the Treasury Management Services listed below. These changes will be effective **June 1, 2024**, and reflected on your June analysis statement (received in July). Please note, not all price changes may impact you. For questions regarding specific Treasury Management price changes, please contact your Banker, Relationship Manager, Treasury Management Advisor or call us at 1-800-480-2001, Monday through Friday, 8:00am to 8:00pm ET and Saturday, 8:00am to 2:00pm ET.

- Automated Healthcare Solutions Fees
- GIACT Fees
- Lockbox Fees
- Real Time Payment Fees
- Safe Cash Manager Fees
- Vault Fees
- Wire Confirmation Fax Fees

As a reminder, use of your account on or after **June 1, 2024**, indicates your acceptance of the changes.

THE HUNTINGTON NATIONAL BANK
PO BOX 1558 EA1W37
COLUMBUS OH 43216-1558



PETERSON CONNERS LLP
545 METRO PL S
DUBLIN OH 43017-5316

Have a Question or Concern?

Stop by your nearest
Huntington office or
contact us at:

1-800-480-2001

www.huntington.com/
businessresources

Huntington Unlimited Plus Checking

Account: -----4754

Statement Activity From: 05/01/24 to 05/31/24		Beginning Balance	\$604,236.65
		Credits (+)	1,015.34
		Regular Deposits	1,000.00
		Interest Earned	15.34
Days in Statement Period 31		Debits (-)	2,050.00
		Regular Checks Paid	2,050.00
Average Ledger Balance* 603,894.52		Total Service Charges (-)	118.00
Average Collected Balance* 603,765.48		Ending Balance	\$603,083.99
* The above balances correspond to the service charge cycle for this account.			

Average Percentage Yield Earned this period 0.029%

Deposits (+)

Account:-----4754

Date	Amount	Serial #	Type	Date	Amount	Serial #	Type
05/16	1,000.00	181614683	Brch/ATM				

Other Credits (+)

Account:-----4754

Date	Amount	Description
05/31	15.34	INTEREST PAYMENT

Checks (-)

Account:-----4754

Date	Amount	Check #	Date	Amount	Check #
05/20	2,050.00	1033			


(*) Indicates the prior sequentially numbered check(s) may have 1) been voided by you 2) not yet been presented 3) appeared on a previous statement or 4) been included in a list of checks.

Service Charge Detail

Account:-----4754

Date	Service Charge (-)	Waives and Discounts (+)	Description
05/15	100.00		WIRE TRANSFER FEES (OUTGOING)

Investments are offered through the Huntington Investment Company, Registered Investment Advisor, member FINRA/SIPC, a wholly-owned subsidiary of Huntington Bancshares Inc.

The Huntington National Bank is Member FDIC. ®, Huntington® and 24-Hour Grace® are federally registered service marks of Huntington Bancshares Incorporated. The 24-Hour Grace® system and method is patented: US Pat. No. 8,364,581, 8,781,955, 10,475,118, and others pending. © 2024 Huntington Bancshares Incorporated.

**Service Charge Detail****Account:-----4754**

Date	Service Charge (-)	Waives and Discounts (+)	Description
05/15	18.00		WIRE TRANSFER FEES (INCOMING)
05/15	40.00		MONTHLY SERVICE FEE
05/15		40.00	TOTAL RELATIONSHIP SERVICE FEE WAIVE

Service Charge Summary**Account:-----4754**

Previous Month Service Charges (-)	\$158.00
Credits - Previous Month Charges (+)	40.00
Net Service Charges	\$118.00
Total Service Charges (-)	\$118.00

Balance Activity**Account:-----4754**

Date	Balance	Date	Balance	Date	Balance
04/30	604,236.65	05/16	605,118.65	05/31	603,083.99
05/15	604,118.65	05/20	603,068.65		

In the Event of Errors or Questions Concerning Electronic Fund Transfers (electronic deposits, withdrawals, transfers, payments, or purchases), please call either 1-614-480-2001 or call toll free 1-800-480-2001, or write to The Huntington National Bank Research - EA4W61, P.O. Box 1558, Columbus, Ohio 43216 as soon as you can, if you think your statement or receipt is wrong or if you need more information about an electronic fund transfer on the statement or receipt. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

1. Tell us your name, your business's name (if appropriate) and the Huntington account number (if any).
2. Describe the error or the transaction you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
3. Tell us the dollar amount of the suspected error. We will investigate your complaint or question and will correct any error promptly.

Verification of Electronic Deposits If you authorized someone to make regular electronic fund transfers of money to your account at least once every sixty days, you can find out whether or not the deposit has been received by us, call either 1-614-480-2001 or call toll free 1-800-480-2001.

Balancing Your Statement - For your convenience, a balancing page is available on our web site <https://www.huntington.com/pdf/balancing.pdf> and also available on Huntington Business Online.



IMPORTANT INFORMATION ABOUT YOUR TREASURY MANAGEMENT SERVICES AGREEMENT

If you have Treasury Management Services through Business Online, (e.g., Account Reconciliation, Automated clearing House ("ACH"), Automated Sweep, Business Security Suite, Cash Deposit and Fulfillment, Controlled Disbursement, eBill Present & Pay, Electronic Deposit, Escrow Solutions, Information Reporting, Integrated Payables, Lockbox Services, Wire Transfer, Zero Balance Accounting, etc.) please know that unless otherwise agreed upon, changes have been made to the Treasury Management Services Agreement. A complete copy of your updated and restated agreement effective July 1, 2024 can be viewed at www.huntington.com/TMServiceAgreement.

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- GIACT Fees
- Lockbox Fees
- Real Time Payment Fees
- Safe Cash Manager Fees
- Vault Fees
- Wire Confirmation Fax Fees

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Peterson Connors LLP

545 Metro Place South, Suite 435
 Dublin, OH 43017
 (614) 365-7000

INVOICE

Invoice # 8054
 Date: 06/05/2024

United States Southern District

Receiver / Root, et al. v. Silver, et al., 2:23cv512

Date	Notes	Timekeeper	Quantity	Rate	Total
03/18/2024	Attention to auction results. Review of sale documents and bid records. Email to M Sugarman re: payoff for Walnut.	Jerry E. Peer, Jr.	0.70	\$150.00	\$105.00
03/18/2024	Phone calls with R Kruse re: high bidder cancelling offer to purchase the property.	Jerry E. Peer, Jr.	0.50	\$150.00	\$75.00
03/19/2024	Attention to options and next steps due to buyer withdrawing offer for Walnut. Attention to payoff from NewRez.	Jerry E. Peer, Jr.	1.80	\$150.00	\$270.00
03/20/2024	Attention to emails re: Walnut. Phone call with R Kruse re: same.	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
03/21/2024	Review of sentencing memorandum.	Jerry E. Peer, Jr.	0.20	\$150.00	\$30.00
04/01/2024	Attention to emails from R Kruse and M Sugarman re: sale of Walnut. Review of offer.	Jerry E. Peer, Jr.	0.70	\$150.00	\$105.00
04/03/2024	Phone call with T Hagerla re: property inspection. Review of inspection report.	Jerry E. Peer, Jr.	1.40	\$150.00	\$210.00
04/05/2024	Attention to property inspections and offers. Attention to records from cell phone and computer. Following up on sale of Mercedes. Attention to messages re: mercedes and offer for Walnut property.	Jerry E. Peer, Jr.	4.70	\$150.00	\$705.00
04/08/2024	Attention to emails re: offer from prospective buyer. Review of inspection provided.	Jerry E. Peer, Jr.	1.90	\$150.00	\$285.00
04/08/2024	Attention to emails from lender's counsel re: auction and payment.	Jerry E. Peer, Jr.	0.20	\$150.00	\$30.00
04/08/2024	Attention to emails re: Vorys access to computer and phone data. Phone call with J Epling re: same.	Jerry E. Peer, Jr.	0.30	\$150.00	\$45.00

EXHIBIT B

04/09/2024	Attention to invoice from Dickinson Wright.	Jerry E. Peer, Jr.	0.20	\$150.00	\$30.00
04/11/2024	Attention to emails re: offers to purchase property and mortgage payments.	Jerry E. Peer, Jr.	0.30	\$150.00	\$45.00
04/12/2024	Attention to emails from T Hagerla and R Kruse re: offers.	Jerry E. Peer, Jr.	0.30	\$150.00	\$45.00
04/23/2024	Phone calls with brokers re: offer to purchase Walnut.	Jerry E. Peer, Jr.	0.50	\$150.00	\$75.00
05/08/2024	Attention to Title for Mercedes. Attention to texts from T Hagerla re: sale of Walnut.	Jerry E. Peer, Jr.	0.30	\$150.00	\$45.00
05/15/2024	Attention to issues pertaining to closing. Review of disclosures from title agent.	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
				Subtotal	\$2,340.00
				Total	\$2,340.00

Statement of Account

Outstanding Balance	New Charges	Payments Received	Total Amount Outstanding
(\$0.00	+ \$2,340.00) - (\$0.00) = \$2,340.00

Please make all amounts payable to: Peterson Connors LLP

Payment is due upon receipt.

Payments more than 30 days overdue incur 1.5% per month interest charges.

Please notify us if your contact information has changed.

Our Tax ID: 20-8129097

Peterson Connors LLP

545 Metro Place South, Suite 435
 Dublin, OH 43017
 (614) 365-7000

INVOICE

Invoice # 8061
 Date: 06/06/2024

United States Southern District

Attorney / Root, et al. v. Silver, et al., 2:23cv512**Services**

Date	Notes	Timekeeper	Quantity	Rate	Total
03/18/2024	Assist with interim report exhibits. Review Fidelity documents.	Catherine Schwartz	0.40	\$125.00	\$50.00
03/18/2024	Drafting seventh report. Drafting motion to confirm sale. Attention to email from P Templeton.	Jerry E. Peer, Jr.	1.60	\$250.00	\$400.00
03/18/2024	Review of auction terms and conditions, contract and notice of cancellation. Phone call with R Kruse re: notice to high bidder.	Jerry E. Peer, Jr.	0.60	\$250.00	\$150.00
03/19/2024	Attention to order granting motion to sell mercedes. Drafting letter to high bidder for Walnut property.	Jerry E. Peer, Jr.	0.80	\$250.00	\$200.00
03/20/2024	Assist with receiver's seventh interim report and emails related to the same; review of the 2543 Walnut Avenue emails.	Catherine Schwartz	0.80	\$125.00	\$100.00
03/20/2024	Drafting Seventh Report. Attention to emails re: assets/accounts. Research re: high bidder backing out of after close of auction.	Jerry E. Peer, Jr.	1.90	\$250.00	\$475.00
03/21/2024	Attention to the outstanding Dickinson Wright invoice; assist Attorney Peer.	Catherine Schwartz	0.30	\$125.00	\$37.50
03/21/2024	Revising 7th report. Drafting demand letter to Mr. Patel. Attention to emails re: sentencing hearing and Evolve Bank account.	Jerry E. Peer, Jr.	1.70	\$250.00	\$425.00
03/26/2024	Emails with Ms. Sherrie Suanico of Corinthian Title Company and processing of closing proceeds from 19803 Vista Del Otero; update Huntington Bank register with recent activities.	Catherine Schwartz	0.60	\$125.00	\$75.00

EXHIBIT C

04/01/2024	Review of auction terms. Drafting demand letter to Mr. Patel re: withdrawal of high bid.	Jerry E. Peer, Jr.	1.00	\$250.00	\$250.00
04/03/2024	Drafting demand letter to Mr. Patel.	Jerry E. Peer, Jr.	0.30	\$250.00	\$75.00
04/04/2024	Review Huntington National Bank online activity and download the March 2024 statement; reconcile the same and provide statement with checking register to JEP and counsel. Process payments for Walnut Avenue pool services, as well as to Dickinson Wright according to the 7th interim reporting. Attention to multiple emails about Walnut Avenue inspection and issues raised by Mr. Azmoodeh.	Catherine Schwartz	0.70	\$125.00	\$87.50
04/09/2024	Several phone calls with R Kruse and T Hagerla re: breach of high bidder, offer from new prospective buyer, inspection, and home warranty. Comparing inspections completed for auction and by prospective buyer. Attention to emails re: same.	Jerry E. Peer, Jr.	2.70	\$250.00	\$675.00
04/10/2024	Drafting 8th interim report.	Jerry E. Peer, Jr.	0.80	\$250.00	\$200.00
04/12/2024	Attention to the string emails about the need for additional deposit toward future payoff. Review file about the similar transaction processed in early January 2024. Exchange in further emails with details to seek confirmation before any next steps are initiated. Travel to and from Frantz Road Huntington branch to commence wire. Transmit a scan of the partially redacted receipt to all by email.	Catherine Schwartz	1.20	\$125.00	\$150.00
04/12/2024	Attention to emails from M Sugarman re: Walnut mortgage.	Jerry E. Peer, Jr.	0.20	\$250.00	\$50.00
04/16/2024	Receipt of Huntington National Bank deposit notice, review online register, attention to the details of this recent activity.	Catherine Schwartz	0.10	\$125.00	\$12.50
04/18/2024	Re: Walnut Avenue Attention to multiple emails about the rejected wire previously confirmed by NewRez / Shellpoint of \$16,000. Write to seek confirmation of the correct amount. Receive a reply from Ms. Shelby Crouse, portfolio manager at Shellpoint, that the amount to wire today is \$16,896.98; travel to and from local Huntington Bank branch to initiate the same; transmit a partially redacted receipt to all in the email chain. Update the receivership banking register.	Catherine Schwartz	1.30	\$125.00	\$162.50
04/23/2024	Receipt and intake of proceeds from the sale of a certain 2018 Mercedes Benz to Encinitas Ford. Attention to multiple emails regarding the same as well as those confirming the hold and	Catherine Schwartz	1.00	\$125.00	\$125.00

	stay regarding Walnut Avenue.				
04/24/2024	Drafting purchase agreement for Walnut property.	Jerry E. Peer, Jr.	2.70	\$250.00	\$675.00
04/25/2024	Drafting motion to sell Walnut Property.	Jerry E. Peer, Jr.	0.90	\$250.00	\$225.00
04/29/2024	Drafting motion to sell walnut. Drafting interim report.	Jerry E. Peer, Jr.	3.40	\$250.00	\$850.00
05/01/2024	Review file and review and revised motion to sell Walnut Property prepared by JEP; attention to related emails.	Istvan Gajary	2.00	\$250.00	\$500.00
05/02/2024	Reconcile the April 2024 Huntington National Bank statement.	Catherine Schwartz	0.20	\$125.00	\$25.00
05/07/2024	Drafting order granting motion to sell. Drafting interim report.	Jerry E. Peer, Jr.	1.80	\$250.00	\$450.00
05/08/2024	Emails with Tyler Hagerla regarding his services in selling the Mercedes, surrendering the Range Rover, and security surveillance at the Walnut property; assist Jerry Peer with preparation of the receiver's eighth interim report.	Catherine Schwartz	0.70	\$125.00	\$87.50
05/10/2024	Drafting 8th report. Attention to status of sale of Walnut and other matters.	Jerry E. Peer, Jr.	1.30	\$250.00	\$325.00
05/14/2024	Drafting Order Granting Motion to Sell Walnut. Drafting Eight report.	Jerry E. Peer, Jr.	1.90	\$250.00	\$475.00
05/15/2024	Attention to emails from counsel to New Rez.	Jerry E. Peer, Jr.	0.30	\$250.00	\$75.00
05/16/2024	Process payment representing the water and sewer escrow holdback from 9125 North Bayshore Drive in Miami, Florida.	Catherine Schwartz	0.50	\$125.00	\$62.50
05/22/2024	Attention to emails about receivership expenses.	Istvan Gajary	0.10	\$250.00	\$25.00
Services Subtotal				\$7,475.00	

Expenses

Date	Notes	Quantity	Rate	Total
03/26/2024	Purchase of USPS postage for service of filed Doc 253	4.00	\$2.11	\$8.44
Expenses Subtotal				\$8.44
Subtotal				\$7,483.44
Total				\$7,483.44

Statement of Account

Outstanding Balance	New Charges	Payments Received	Total Amount Outstanding
(\$0.00	+ \$7,483.44) - (\$0.00) = \$7,483.44

Please make all amounts payable to: Peterson Conners LLP

Payment is due upon receipt.

Payments more than 30 days overdue incur 1.5% per month interest charges.

Please notify us if your contact information has changed.

Our Tax ID: 20-8129097

IN ACCOUNT WITH



180 E. BROAD STREET, SUITE 8400
COLUMBUS, OH 43215
TELEPHONE: (614) 744-2570
<http://www.dickinsonwright.com>
FEDERAL I.D. #38-1364333

INVOICE DATE: APRIL 8, 2024
INVOICE NO.: 1910073

JERRY E. PEER, JR.
PETERSON CONNERS LLP
545 METRO PLACE SOUTH, SUITE 435
DUBLIN, OH 43017

ATTN: Jerry E. Peer, Jr.

CLIENT/MATTER NO.: 106102-00001

RE: COUNSEL FOR RECEIVER - ROOT, INC., ET AL. V. SILVER ET AL.

PRIVILEGED AND CONFIDENTIAL

FOR PROFESSIONAL SERVICES THROUGH MARCH 31, 2024

		<u>USD</u>
TOTAL FEES CURRENT INVOICE	\$	1,453.00
TOTAL DISBURSEMENTS CURRENT INVOICE	\$	137.89
TOTAL CURRENT INVOICE	\$	<u>1,590.89</u>

EXHIBIT D

Remittance Instructions			
Terms: Due and Payable Upon Receipt			
Mail To:	Pay Online:	Wire Instructions:	ACH Instructions:
Dickinson Wright PLLC 2600 W. Big Beaver Suite 300 Troy, MI 48084	Credit Card and ACH/eCheck Payments We accept Visa®, Mastercard®, American Express® and Discover® https://www.dickinson-wright.com/invoice-payment	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: 021 000 021 Swift Code: CHASUS33 (International) Account# 38852	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: 072 000 326 Account# 38852
(Please reference your client/invoice numbers when paying electronically)			

IN ACCOUNT WITH



180 E. BROAD STREET, SUITE 8400
 COLUMBUS, OH 43215
 TELEPHONE: (614) 744-2570
<http://www.dickinsonwright.com>
 FEDERAL I.D. #38-1364333

COUNSEL FOR RECEIVER - ROOT, INC., ET AL. V. SILVER ET AL.
 CLIENT/MATTER NO.: 106102-00001

INVOICE DATE: APRIL 8, 2024
 INVOICE NO.: 1910073
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CURRENT INVOICE DETAIL

<u>DATE</u>	<u>INITIALS</u>	<u>SERVICES</u>	<u>HOURS</u>	<u>VALUE</u>
03/01/24	AER	Call w/counsel Re lien; Exchanged emails w/counsel Re same; Exchanged emails w/client Re lienor's agreement to discharge.	0.4	258.00
03/04/24	AER	Reviewed Ch. 713, Fla. Stat. Re discharge; Reviewed official records in advance of drafting same; Exchanged emails w/client Re same; Reviewed lien; Prepared release and discharge; Exchanged emails w/lienor's counsel Re same; Reviewed executed release; Prepared update email to client Re same.	1.2	774.00
03/05/24	AER	Reviewed email from client Re discharge of lien; Reviewed email from buyer's counsel Re same; Exchanged emails w/lienor's counsel Re original; Exchanged emails w/JS Re same.	0.2	129.00
03/06/24	HV	Review and analyze the Plaintiff's motion to vacate and to release lien; communicate internally regarding the same.	0.3	171.00
03/06/24	JRS	Receipt and review of motion to cancel sale and dismiss complaint.	0.2	121.00
TOTAL FEES			2.3	\$ 1,453.00

DISBURSEMENTS

	<u>VALUE</u>
Delivery Expense	137.89
TOTAL DISBURSEMENTS	\$ 137.89
TOTAL CURRENT INVOICE	\$ 1,590.89

TIMEKEEPER SUMMARY

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>RATE</u>	<u>HOURS</u>	<u>VALUE</u>
ADAM E RICHARDS	MEMBER	645.00	1.80	1,161.00
JONATHAN R. SECREST	MEMBER	605.00	0.20	121.00
H. STEVEN VOGEL	MEMBER	570.00	0.30	171.00
TOTAL FEES CURRENT INVOICE			2.30	\$ 1,453.00